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**From:** [Lawrence Flynn](#)  
**To:** [Speer, R. Taylor](#)  
**Cc:** [Ginny Bozeman](#)  
**Subject:** [EXT] FW: Deposit Return  
**Date:** March 16, 2023 12:15:50 PM  
**Attachments:** [Deposit Options 3-16-23.pdf](#)

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**SUBJECT TO RULE 408, SCRE & FRE**

Taylor

See my email to Litchain below (presumably Mr. Tate). He has already responded, confirming receipt and making some loose allegations regarding violations of the NDA.

Also, as requested, see the attached deposit report, showing the current and anticipated balance of the Litchain deposit, the anticipated deposit for Blockquarry under the PMPA ED rate, and the anticipated deposit in the event the PMPA rate is not available.

Finally, BPW is uncomfortable assigning Blockquarry any credit for the Litchain deposit. As discussed, our preference that the funds be interplead to the Court upon the filing of the DJ action.

Additionally, we will likely do the same with the various equipment remaining on the site. We understand that this approach may affect your client's ability and appetite to move forward with a new lease and service agreement with BPW. Ultimately, we determined that the upside of any new agreement does not outweigh our potential risks of failing to return the deposit funds in accordance with our standard utility practice.

I plan to follow up with a call this afternoon if have any questions. LEF

Lawrence Flynn III

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Member | Pope Flynn, LLC

DIRECT: [\(803\) 354-4902](#)

FAX: [\(803\) 354-4899](#)

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**From:** Lawrence Flynn  
**Sent:** Thursday, March 16, 2023 9:48 AM  
**To:** Litchain Corp <[litchaincorp@gmail.com](mailto:litchaincorp@gmail.com)>  
**Cc:** Ginny Bozeman <[gbozeman@popeflynn.com](mailto:gbozeman@popeflynn.com)>  
**Subject:** RE: Deposit Return

Thank you for your email. Receipt is confirmed.

We are aware of the outstanding deposit for Litchain's electric service account with Gaffney BPW. There are still several outstanding items to be applied against the deposit, namely carrying costs associated with the economic development rate from PMPA and other initial equipment items initially paid by Gaffney BPW. Once the rate schedule agreement with PMPA is terminated and all residual costs are applied against the deposit, a final accounting will be completed, and the remaining balance will be remitted. Please let me know if you need an itemized accounting of amounts applied against the deposit since the service account was terminated. We anticipate knowing a final number and remitting balance within the next 30 days.

Additionally, a variety of equipment and other crypto mining assets remain on the formerly leased premises. Gaffney BPW wants such items to be returned to their rightful owners. Please provide us with an ownership inventory of all equipment and other assets remaining on the site so that we can ensure such items can be provided provided to their rightful owners. We intend to perform UCC searches, but would appreciate any additional information that you can provide to assist this process.

Further, and as noted in prior correspondence, all communications regarding the deposit funds, and all remaining equipment/assets on the formerly leased premises should be directed to me, as legal counsel for Gaffney BPW. If Litchain is represented by legal counsel, please provide me with the appropriate contact information for your legal counsel as the ethics rules prohibit me from dealing directly with parties that are represented by legal counsel.

Thank you for your understanding and your prompt attention to the matters addressed in this email.

**Lawrence Flynn III**

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**From:** Litchain Corp <[litchaincorp@gmail.com](mailto:litchaincorp@gmail.com)>

**Sent:** Tuesday, March 14, 2023 4:52 PM

**To:** Lawrence Flynn <[lflynn@popeflynn.com](mailto:lflynn@popeflynn.com)>

**Subject:** Deposit Return

Good afternoon Atty Flynn.

Please have your client cut me the check that is the remainder of my deposit \$637,692.52

Please let me know if I can have a company representative pick it up in person or have them express

mail it to me:

LITCHAIN CORP  
3415 W Lake Mary Blvd  
Suite 950702  
Lake Mary, FL 32795

Thanks again for your kind time and attention to this important matter.

Sincerely,  
Litchain Corp

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